

The Honorable Jessica G. L. Clarke
 United States District Court Judge
 Southern District of New York
 500 Pearl Street
 New York NY, 10007

Re: Rapaport v. Epstein, 24-cv-07439

Reply to Opposition of Letter-Motion for Extension of Time to Effectuate Service

Your Honor:

I am respectfully writing in reply to defendants Iyer, Garrett, Weinberg and Nelms' opposition to my letter-motion to extend the time for service by 30 days.

While it is true that Mr. Field has very recently accepted service on behalf of defendant Garrett as his agent on December 23, 2024, I have not yet received an affidavit of service from my process server for defendant Epstein. This is despite arranging for service upon him with a process serving agency at the same time as all other defendants, and additionally arranging for a second agency to serve process more than two weeks ago.

I also write respectfully to correct some errors and omissions in the opposition letter. At the time I arranged for service with the first process serving agency, when I corresponded with Mr. Field on December 13 2024, and when I moved for this extension of time on December 20, 2024, there was no online law firm biography available for defendant Garrett indexed by the multiple major internet search engines I utilized. On December 13 I inquired of Mr. Field if he had any address where defendant Garrett may be served, as the previous address I had for him, at the Ninth Circuit courthouse in San Francisco, was no longer valid. Mr. Field represented to me that he had no address for defendant Garrett despite representing him in the related case *Rapaport v. Iyer et al.* 23-cv-06709.

I appreciate that defendants Iyer and Garrett, who in that related case are also represented by Mr. Field of Schaerr-Jaffe LLP now acknowledge, in a welcome reversal of a prior position, that different web pages on the internet may have different contents at different times by contrasting defendant Garrett's new law firm biography page with his LinkedIn page (which still lists the Ninth Circuit as his place of employment) in their Opposition. Previously, defendants Iyer and Garrett have incredibly represented to this Court that an August 1, 2022 PDF snapshot of a single web page of a single thread on a forum, sent by defendant Garrett to the Federalist Society, conclusively disproves the allegation of any other post being made anywhere else on the internet at any time. *Rapaport v. Iyer et al.* 23-cv-06709 Docket No. 54 at 15.

Thank you for considering my request in this matter.

Respectfully submitted,

/s/ Gideon Rapaport *pro se*
 GideonRapaportLaw@outlook.com
 (862) 213-0895
 #627 1078 Summit Avenue
 Jersey City, New Jersey, 07307